

BellSouth Telecommunications, Inc.

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December 20, 2002

Guy M. Hicks General Counsel

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Fax 615 214 7406

VIA HAND DELIVERY

Hon. Sara Kyle, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

Re:

Complaint by Aeneas Internet and Telephone

Docket No. 02-01274

Dear Chairman Kyle:

Enclosed are the original and fourteen copies of BellSouth's Motion for Extension of Time to Respond to Letter. Copies of the enclosed are being provided to counsel for Aeneas.

Very truly yours,

Guy M. Hicks

GMH:ch

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re:

Complaint by Aeneas Internet & Telephone

Docket No. 02-01274

MOTION FOR EXTENSION OF TIME
TO RESPOND TO LETTER

BellSouth Telecommunications, Inc. ("BellSouth") requests a two week extension of time, from January 3 to until January 17, 2003, to respond to the Staff's letter of December 5, 2002.

On November 27, 2002, Aeneas Internet and Telephone ("Aeneas") mailed a letter to the TRA Staff containing a number of complaints against BellSouth ("the Aeneas letter"). Aeneas failed to serve a copy of that letter on BellSouth.<sup>1</sup> On December 6, 2002, the TRA Staff provided a copy of the Aeneas letter to BellSouth. The Staff's letter stated that "consistent with TRA Rule 1220-1-2-.03 please provide a response to this complaint within 30 days (January 3, 2003)."<sup>2</sup>

BellSouth is in the process of investigating the complaints made by Aeneas.

BellSouth's initial review of the Aeneas letter identified numerous departments and subject matter experts within BellSouth that need to be consulted in order for BellSouth to provide a complete and accurate response. Some of these employees

<sup>&</sup>lt;sup>1</sup> Attachment D to the Aeneas letter is a copy of a letter dated April 17, 2002, from Mr. David Waddell, former Executive Secretary of the Authority, to Aeneas responding to a letter from Aeneas dated April 3, 2002. Aeneas failed to provide BellSouth with a copy of its April 3 letter as well.

<sup>&</sup>lt;sup>2</sup> BellSouth calculates that 30 days from December 6 would be January 5, not January 3, 2003.

are not available at various times in December due to holiday vacations and other commitments. BellSouth's review also determined that numerous records may need to be reviewed in order to respond fully to the letter.

It is possible that BellSouth will be able to submit a partial response to the Aeneas letter a few days prior to January 17. BellSouth is unable, however, to provide the Authority a complete response to the Authority by January 3, 2003.

WHEREFORE, BellSouth respectfully requests that the Authority grant it an extension from January 3, 2003 until January 17, 2003, to respond to the Aeneas letter.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

Bv:

Guy M. Hicks Joelle J. Phillips 333 Commerce Street, Suite 2101 Nashville, TN 37201-3300 615/214-6301

## CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2002, a copy of the foregoin document was served on the parties of record, via the method indicated:	
[ ] Hand  √ Mail [ ] Facsimile [ ] Overnight	Jonathan V. Harlan, CEO Aeneas Internet & Telephone 301 S. Church Street Jackson, TN 38301

